

FOLEY & LARDNER LLP
Mark A. Aiello (*pro hac vice*)
Salvatore A. Barbatano
One Detroit Center
500 Woodward Avenue, Suite 2700
Detroit, MI 48226-3489
Telephone: (313) 234-7100
Facsimile: (313) 234-2800

Attorneys for Visiocorp USA, Inc., Visiocorp Mexico, S.A. de C.V., and Visiocorp P.L.C.

**UNITED STATES BANKRUPTCY COURT
THE SOUTHERN DISTRICT OF NEW YORK**

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In re:	: Chapter 11
	: :
GENERAL MOTORS CORP., <i>et al.</i> ,	: Case No. 09-50026 (REG)
	: :
Debtors	: Jointly Administered
	: :
-----X	

**OBJECTION OF VISIOCORP USA, INC.,
VISIOCORP MEXICO, S.A. DE C.V., AND VISIOCORP P.L.C. TO
ASSUMPTION AND ASSIGNMENT OF CERTAIN EXECUTORY
CONTRACTS AND CURE AMOUNTS RELATED THERETO**

Visiocorp USA, Inc., Visiocorp Mexico, S.A. de C.V., and Visiocorp P.L.C.

(“Suppliers”), by their attorneys Foley & Lardner LLP, hereby submits this objection (the
“Objection”) to the Debtors’ assumption and assignment of certain executory contracts and the
Debtor’s proposed Cure Amounts related thereto. In support of its Objection, Supplier states as
follows:

PRELIMINARY STATEMENT

1. Debtors have asserted that they have sent Supplier a notice of (I) Debtors’ Intent
to Assume and Assign Certain Executory Contracts, Unexpired Leases of Real Property, and
Unexpired Leases of Nonresidential Real Property and (II) Cure Amounts Related Thereto (the

“Notice”), in which the Debtors designate certain agreements (the “Assumable Executory Contracts”) between Supplier and the Debtors that may be assumed and assigned to Vehicle Acquisition Holdings LLC (the “Purchaser”).

2. To date, Supplier has not received a complete Notice and only today received a copy of a Notice. However, the entity identified by the Debtors in the Notice is incorrect and Supplier is unable to access the proper information regarding the assumption and Cure Amounts.

ARGUMENT

I. Notice is Deficient

3. Supplier understands from communications with the Debtors that the Debtors assert that they have mailed the Notice to Supplier.

4. To date, Supplier has not received a complete or proper Notice. Supplier has made a diligent effort to ascertain the information contained therein, including by contacting the Debtors’ call center for inquiries related to assumption.

5. Despite its efforts, Supplier has been unable to ascertain the identity of the Assumable Executory Contracts or cure amounts associated therewith.

6. Supplier therefore objects to assumption of the Assumable Executory Contracts and reserves all rights to further object to the Notice and/or any further Notices received from the Debtors.

RELIEF REQUESTED

WHEREFORE, Supplier requests that the Court enter an order denying the Debtor’s request to assume and assign the Assumable Executory Contracts, and grant such other and further relief as the Court deems just and proper.

Dated: June 15, 2009

FOLEY & LARDNER LLP

By: /s/ Salvatore A. Barbatano
Mark A. Aiello (*pro hac vice pending*)
Salvatore A. Barbatano
FOLEY & LARDNER LLP
One Detroit Center
500 Woodward Avenue, Suite 2700
Detroit, MI 48226-3489
Telephone: (313) 234-7100
Facsimile: (313) 234-2800

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CERTIFICATE OF SERVICE

I hereby certify that on June 15, 2009, I caused the *Objection Of Visiocorp USA, Inc., Visiocorp Mexico, S.A. De C.V., And Visiocorp P.L.C. To Assumption And Assignment Of Certain Executory Contracts And Cure Amounts Related Thereto* to be served via U.S. Mail on the following at the addresses set forth below:

General Motors Corporation
Attn: Warren Command Center
Mail Code 480-206-114
30009 Van Dyke Avenue
Warren, Michigan 48090-9025

Weil, Gotshal & Manges LLP
Attorneys for the Debtors
Attn: Harvey R. Miller, Esq.
Stephen Karotkin, Esq.
Joseph H. Smolinsky, Esq
767 Fifth Avenue
New York, New York 10153

U.S. Treasury
Attn: Matthew Feldman, Esq.
1500 Pennsylvania Avenue NW
Room 2312
Washington, D.C. 20220

Cadwalader, Wickersham & Taft LLP
Attn: John J. Rapisardi, Esq.
Attorneys for the Purchaser
One World Financial Center
New York, New York 10281

Vedder Price, P.C.
Michael J. Edelman, Esq.
Michael L. Schein, Esq.
Attorneys for Export Development Canada
1633 Broadway, 47th Floor,
New York, New York 10019

Office of the United States Trustee
Southern District of New York
Attn: Diana G. Adams, Esq.
33 Whitehall Street, 21st Floor
New York, New York 10004

Kramer Levin Naftalis & Frankel LLP
Attorneys for the Official Committee of
Unsecured Creditors
Attn: Gordon Z. Novod, Esq.
1177 Avenue Of The Americas
New York, NY 10036

Dated: June 15, 2009

FOLEY & LARDNER LLP

By: /s/ Salvatore A. Barbatano
Salvatore A. Barbatano
500 Woodward Avenue, Suite 2700
Detroit, MI 48226-3489
Telephone: (313) 234-7100
Facsimile: (313) 234-2800